



# Complaints Handling Policy

Last updated: 27 August 2022

## Snapshot – how to complain:

Friends of Femili PNG (FFPNG) welcomes, encourages and responds to all feedback on its activities. This includes complaints.

Complaints can be made in-person, over the phone, via email, letter or messenger.

- If your complaint relates to fundraising, financial, safeguarding issues (such as child protection, sexual exploitation or abuse), or organisational management, contact the FFPNG CEO via phone on +61 2 6125 3446 or via email on [ceo.friends@femilipng.org](mailto:ceo.friends@femilipng.org)
- If your complaint relates to Femili PNG services, contact the Development Adviser on via phone on +61 2 6125 3446 or via email on [dev.manager@femilipng.org](mailto:dev.manager@femilipng.org)
- If you wish to escalate your complaint or complain directly to FFPNG's Board, contact the Board Chair Stephen Howes on [stephen.howes@anu.edu.au](mailto:stephen.howes@anu.edu.au)
- If you wish to complain about FFPNG conduct or activities to an external body, contact:
  - Australian Council for International Development (ACFID) Code of Contact Committee via [www.acfid.asn.au/code-of-conduct/complaints-and-compliance-monitoring](http://www.acfid.asn.au/code-of-conduct/complaints-and-compliance-monitoring).
  - Australian Charities and Not-for-Profits Commission (ACNC) if you believe there are issues with Friends of FFPNG's charity registration, provision of accurate information, use of funds, fraud or criminal activity, or failure to act in good faith in the charity's best interest, among others: [www.acnc.gov.au/raise-concern/concerns-about-charities/what-acnc-can-investigate](http://www.acnc.gov.au/raise-concern/concerns-about-charities/what-acnc-can-investigate)

## DOCUMENT VERSION

Date	Comments
27 August 2022	Policy approved by FFPNG Board

## POLICY AMENDMENTS

This is a working document and subject to amendment.

Any suggestions about this Complaints Handling Policy (Policy) should be directed to the Friends of Femili PNG (FFPNG) CEO so changes can be considered. Any amendments or changes to the Policy will be submitted to the Board for endorsement.

The FFPNG CEO is responsible for maintaining this document; including updating confirmed changes, informing staff of the changes, and disseminating the latest version across the organisation.

Any changes or amendments involve the following steps:

- Updating the Document Version table at the top of this page;
- Updating the relevant provision in this Policy;
- Replacing the updated version of the Policy, eg. shared drives, website;
- Communicating the changes to all staff; and
- Archiving the old version of the Policy.

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## 1.0 INTRODUCTION

Friends of Femili PNG (FFPNG) welcomes and encourages all feedback as we strive to improve our programs, fundraising and technical support activities. Feedback can take the form of suggestions, compliments or complaints. We aim to make our feedback and complaints process as accessible as possible, and encourage contact through phone, social media platforms, writing and/or email.

FFPNG is committed to ensuring that any person or organisation engaging with FFPNG activities, affected by its operations or using Femili PNG services has the right to provide feedback, lodge a complaint or to appeal a decision of FFPNG and to have their concerns addressed in ways that ensure access and equity, fairness, accountability and transparency.

FFPNG aims to provide a complaints and feedback handling procedure that:

- is simple and easy to use;
- is promoted to all stakeholders;
- ensures complaints are fairly assessed and responded to promptly;
- is procedurally fair and follows principles of natural justice; and
- complies with legislative requirements and compliance obligations.

FFPNG takes all complaints and allegations very seriously. All complaints are treated confidentially. All FFPNG staff review this Policy on induction. Relevant FFPNG staff are required to undertake regular training and/or review of this Policy.

### 1.1 Purpose

The purpose of this Policy is as follows:

- a. Provide an avenue for stakeholders to raise complaints and provide feedback to FFPNG and to ensure that all issues are addressed in a respectful, timely, constructive and positive way.
- b. To minimise damage of FFPNG's reputation and reduce the risk of litigation by providing a clear and accountable mechanism by which complaints made against a FFPNG staff member, partner or against the organisation in general, may be addressed.
- c. To ensure that FFPNG and its staff continue to comply with its operational policies including, but not limited to, the code of conduct, child protection, anti-fraud and anti-corruption and prevention of sexual exploitation, abuse and harassment.

### 1.2 Definitions

A complaint shall be deemed to mean any statement of any person alleging a grievance involving the action, inaction, activities or behaviour of any FFPNG employee, partner or Board member. Stakeholders are encouraged to give feedback, complaints and comments about the service in whatever form. All complaints will warrant the same treatment as a written complaint.

A complaint will usually include at least one of the following elements:

- a. Complaint about FFPNG's staff or activities.
- b. Complaint about Femili PNG or other partner services.

- c. Potential damages or damages suffered by stakeholders as the result of FFPNG's activities.
- d. Request for corrective measures.

A complaint is not:

- a. A general query about the work of FFPNG or Femili PNG.
- b. A request for information.
- c. A contractual dispute.
- d. A request to amend records e.g. to correct an address, cancel a donation.
- e. A request to unsubscribe from a FFPNG 'service' e.g. a campaign newsletter.

In general, complaints can include (but are not limited to):

- Dissatisfaction with a service or technical support that has been provided.
- Concern about a donation that has been made.
- Concern about the behaviour or actions of staff.
- Issues with a communications or fundraising approach or campaign.

### **1.3 Principles**

The following principles underlie FFPNG's complaints handling policy:

- The intention of FFPNG is to minimise and prevent the incidence of complaints.
- All FFPNG stakeholders have access to a clear and accountable complaints mechanism.
- FFPNG will consider all feedback and complaints it receives.
- FFPNG will treat all complainants with respect, recognising the rights of the complainant and that the issue of complaint is important to the complainant.
- FFPNG will maintain confidentiality of parties involved, keeping any information private to those directly involved in the complaint and its resolution.
- In the event of a complaint being made, FFPNG is committed to dealing with the complaint promptly.
- FFPNG will act upon feedback received and undertake a fair investigation of any complaints. A resolution will be pursued through open communication, evaluation and review.
- FFPNG will ensure that Board members and staff are provided with information about the complaints procedure as part of their induction and are aware of procedures for managing stakeholder feedback and complaints.
- FFPNG will ensure partners, service users and stakeholders are aware of their rights and the complaints policy and procedures.
- FFPNG will ensure that a complainant is not penalised in any way including being prevented from use of a partner's services during the progress of an issue.
- Stakeholders who have lodged a complaint will have access to the information gathered through an investigation of the complaint and be informed of outcomes of the complaint procedure (where it is not prohibited by confidentiality requirements).

- FFPNG assists Femili PNG to be accountable for the quality and manner of service delivery and encourages clients to question or comment on the service they receive, and possible improvements that can be made to it. FFPNG will ensure, where possible, that advocacy is available to Femili PNG clients who make a complaint and require support.
- Third parties who are approached in relation to complaints, will be asked to encourage the stakeholder to use the complaint's policy procedures, but if they are unable or unwilling to themselves make the complaint the third party may provide feedback to FFPNG on their behalf, in the interests of improving the services provided and activities undertaken.

### **1.4 References / Other policies**

This Policy must be read and understood in conjunction with the following other policies:

- FFPNG's Child Protection Policy and Code of Conduct - for complaints involving allegations of child abuse and reporting procedures.
- FFPNG HR Manual – for complaints involving staff misconduct or for grievance procedures relating to staff complaints.

## **2.0 MAKING A COMPLAINT**

FFPNG values feedback and complaints from donors, clients and the public. General complaints **in Australia** should be addressed to:

Friends of Femili PNG  
 C/- Development Policy Centre  
 Australian National University  
 7 Liversidge St, Acton ACT 2601.

Email: [friends@femilipng.org](mailto:friends@femilipng.org).  
 Phone: +61 (0)2 6125 3446.

Complaints can be made in-person, over the phone, via email, letter or messenger.

- **If your complaint relates to fundraising, financial, safeguarding (such as child protection, sexual exploitation or abuse) or organisational management**, contact the FFPNG CEO via on phone on +61 2 6125 3446 or via email on [ceo.friends@femilipng.org](mailto:ceo.friends@femilipng.org)
- **If your complaint relates to Femili PNG services**, contact the Development Adviser on via phone on +61 2 6125 3446 or via email on [dev.manager@femilipng.org](mailto:dev.manager@femilipng.org)
- **General complaints** can also be addressed to [friends@femilipng.org](mailto:friends@femilipng.org)
- Complaints can also be made through **social media**. To do so, visit the Facebook page [facebook.com/FemiliPNG](https://facebook.com/FemiliPNG) and lodge your complaint via messenger.

- **Complaints can also be made directly to the Chair of FFPNG in writing to [stephen.howes@anu.edu.au](mailto:stephen.howes@anu.edu.au), marked confidential.**

Feedback and complaints can also be lodged **in PNG** directly to the Femili PNG CEO and Lae Operations Director (as FFPNG Board members). Contact details are below:

**FFPNG Lae Case Management Centre**

PO Box 616

Lae, Morobe Province, Papua New Guinea

Email: [info@femilipng.org](mailto:info@femilipng.org)

Phone: +675 7091 4027 or +675 472 8904

**FFPNG Port Moresby Case Management Centre**

PO Box 724, Vision City

Port Moresby, Papua New Guinea

Email: [info@femilipng.org](mailto:info@femilipng.org)

Phone for Bel isi subscribers: +675 7055 4401

Other enquiries/assistance: +675 7916 9063

## **2.1 External complaints**

In Australia, external complaints can be made to the Australian Charities and Not-for-Profits Commission (ACNC) if you believe there are issues with Friends of FFPNG’s charity registration, provision of accurate information, use of funds, fraud or criminal activity, or failure to act in good faith in the charity’s best interest, among others:

<https://www.acnc.gov.au/raise-concern/concerns-about-charities/what-acnc-can-investigate>

Complaints relating to a breach of the Australian Council for International Development (ACFID) Code of Conduct be made to the ACFID Code of Contact Committee via [www.acfid.asn.au/code-of-conduct/complaints-and-compliance-monitoring](http://www.acfid.asn.au/code-of-conduct/complaints-and-compliance-monitoring).

## **2.2 Examples of Serious Breaches**

Serious breaches of the Code of Conduct may include (but are not limited to) conduct that:

- a. Breaches the Child Protection Policy.
- b. Is dishonest, fraudulent, corrupt, illegal or unethical.
- c. Involves mismanagement or waste of FFPNG funds or resources.
- d. Could cause financial or non-financial loss to FFPNG.
- e. Is materially detrimental to the interests, reputation and good standing of FFPNG.
- f. Is an abuse of authority, position or information.
- g. Poses a serious risk of harm to a FFPNG employee, beneficiary, volunteer, partner supplier including to their health, safety or environment.
- h. Is an incident of sexual exploitation, abuse or harassment.

## **2.3 Partners and complaints handling**

Where possible, FFPNG shall encourage partners to acknowledge, adopt and comply with this Policy through the use of MoUs and other agreements. FFPNG will provide guidance to partners on our complaints handling processes.

FFPNG understands that, in many cases, this Policy cannot bind other stakeholder organisations it works with. However, FFPNG will promote good practice in complaints handling to partners and other stakeholders.

From time to time, FFPNG may receive complaints that do not fall within the scope of this Policy. This may include complaints against a government employee, core service provider, donor or other organisation. These complaints will be referred to the FFPNG CEO to decide on a course of action. These actions may include reporting serious breaches to the relevant authorities.

## **2.4 Complaints from children**

FFPNG is committed to making complaints handling processes accessible to children in Australia and PNG. In Australia, easy pathways are provided through technology – use of website forms and messenger. This can be challenging in PNG in an environment where there are difficulties with access to technology. Children are users of Femili PNG services through either being child clients or dependents of clients. FFPNG will promote the ability of children to make complaints, through ensuring complaints processes are visible, accessible, responsive and confidential.

If a child has a complaint about Femili PNG, there are a few different options available to them. We encourage the child to talk with their case worker if their complaint does not involve them. If the complaint involves their case worker, the child is encouraged to speak directly with the Femili PNG Operations Director and CEO/Senior Social Worker. In turn, the Femili PNG CEO or Operations Director may report the complaint to FFPNG for investigation.

If the child is uncomfortable raising the complaint with Femili PNG staff, they may consider discussing it with another trusted adult such as a teacher or a relative. Children in FFPNG programs may also report to the District Welfare Child Protection Officer.

**FFPNG's Child Protection Policy outlines the processes for handling a child protection complaint in Australia.**

**Mandatory reporting requirements in relation to child protection in PNG are outlined in *Lukautim Pikinini Gut Long Birua* – Femili PNG's Child Protection Policy.**

## **2.5 Complaints about Femili PNG**

Given the close relationship between FFPNG and Femili PNG, FFPNG assists Femili PNG complaints handling in two different ways, by:

- Supporting Femili PNG to handle complaints that it receives; and
- Providing a pathway for Femili PNG's clients and stakeholders to also complain to FFPNG, if they prefer.

This Policy aims to impartially assess the complaint in a manner which ensures there is adequate opportunity for all parties to present their case. It also aims to ensure that Femili PNG's clients have redress if they have been disadvantaged by a decision of a staff member. It provides an opportunity for FFPNG to support Femili PNG to identify and rectify problems in philosophy or management that may be impeding their ability to assist clients. The complaints procedure may not necessarily resolve a conflict.

Complaints can be sent, in writing or verbally, to any member of Femili PNG or to the FFPNG CEO or Development Adviser.

Clients are placed in a difficult position when they complain, as their only contact with the organisation may be through the person about whom they wish to complain. FFPNG and Femili PNG should bear this in mind when considering whether a complaint is being made and what action should follow. Suppression of a complaint by a worker is viewed seriously, particularly as it may provide important information on Femili PNG policies and practices.

FFPNG and Femili PNG will deal with client complaints as quickly as possible; however we must balance the need for a fair hearing against other clients' needs for service. Every attempt should be made by the Femili PNG Operations Director and CEO/SSW to ensure that support is offered to staff who have had a complaint made against them.

**The full process and procedure for dealing with complaints from clients is in Section 10 of Femili PNG's Case Management Police and Procedure Manual.**

### **3.0 PROCESSING THE COMPLAINT**

The receiving staff member is to commence the process by promptly registering the complaint in the confidential Complaints Register.

The complainant is informed within five (5) days that their complaint has been received and they are provided with information about the process and timeframe applying to the investigation of their complaint.

#### ***3.1 Timeframe for investigating the complaint***

The timeframe for investigating the complaint is as follows:

- The complaint is examined within three working days of the complaint being received (unless it is an allegation of an offence or matter which requires immediate attention eg. sexual assault or child abuse, in which case it must be actioned urgently).
- Proceed to investigate the complaint and decide the process for response.
- Inform the complainant by letter within five working days of the complaint being received of what is being done to investigate and resolve it, and the expected timeframe for resolution.
- As far as possible, complaints will be investigated and resolved within seven working days of being received. If this timeframe cannot be met, the complainant will be informed of the reasons why and of the alternative timeframe for resolution.

#### ***3.2 Resolving the Complaint***

Once the complaint has been received by FFPNG, it is referred to the appropriate person to investigate. See Section 2 above. Complaints about Femili PNG are referred to the Development Advisor to investigate.

The complaint will be investigated objectively according to the principles of natural justice and the following processes:

1. The investigator will seek to fully understand the nature and details of the complaint from the complainant.
2. The investigator will review the relevant evidence regarding the complaint which may include emails, documents, case notes, etc.

3. The investigator will interview those who are subject to the complaint and any witnesses.
4. Depending on the nature and seriousness of the complaint, if necessary, the complaint may be escalated to the Board and/or authorities as soon as possible.
5. The investigator will document their findings and share accordingly with relevant staff, Board and/or funders.

Once the outcome of the complaint is decided, inform the complainant of the outcome. The outcome may be as follows:

- a. Upheld, and if so, what will be done to resolve it.
- b. Resolved and how this has been achieved.
- c. If no further action can be taken, inform the complainant of the reasons for this.
- d. Inform the complainant of any options for further action, where relevant.

FFPNG commits to a survivor-centered approach to complaints handling. In the event of a complaint about Femili PNG services, FFPNG and Femili PNG will provide appropriate assistance, which may include facilitating access to medical, legal, welfare or other assistance. In instances where the complainant is not comfortable with FFPNG or Femili PNG providing this assistance, referrals to other service providers will be made.

Where a complaint has been made about Femili PNG services by a third party – for example, a family member or employer complaining about a client’s case – both FFPNG and Femili PNG are to respect the client’s confidentiality above all else. For the sake of clarity, this means that divulging details of the client’s case, or even whether the person is a Femili PNG client, to a third party is prohibited in the complaints process unless the client provides informed consent.

### **3.3 Escalation of Serious Issues**

If the complaint is regarding a serious issue, such as that outlined in section 2.2 of this Policy, staff misconduct, a matter that jeopardises positive outcomes for a client or a matter that may lead to legal proceedings against FFPNG, the complaint must be elevated to the FFPNG CEO for oversight of the resolution process.

FFPNG may seek legal advice on the best way to respond, if necessary, and will abide by mandatory and contractual reporting requirements. Complaints regarding child protection and incidents of sexual exploitation, abuse or harassment shall be reported in accordance to the procedures outlined in their respective policies.

### **3.4 Reviewing the Complaint**

If the complainant is not satisfied with the investigation and proposed resolution of their complaint they can seek a further review of the matter by contacting the FFPNG CEO. If the complainant prefers, they can also seek further review by contacting the Chair of FFPNG.

Nothing in this Policy takes away a client’s individual right to use relevant civil or criminal legal procedures to settle their complaint.

## **4.0 RECORDKEEPING**

A confidential Complaints Register will be kept by FFPNG. The Register will be maintained and will record the following for each complaint:

- a. Details of the complainant and the nature of the complaint.
- b. Date lodged.
- c. Who will manage the complaint, and decide the outcome.
- d. Actions taken.
- e. Date of resolution and reason for decision.
- f. Record of complainant being notified of outcome.
- g. Complainant response and any further action.

The Complaints Register and all associated files will be confidential. FFPNG is able to de-identify complaints upon complainant request.